

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

G-Oni Jones

Case: 2:21-mj-30351

Case No. Judge: Unassigned,

Filed: 07-16-2021 At 11:33 AM

USA v. G-ONI JONES (CMP)(MLW)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 14, 2021 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:

Code Section

21 U.S.C. § § 841 (a)(1) and 846

Offense Description

Conspiracy to possess with intent to distribute controlled substances, including fentanyl and marijuana.

This criminal complaint is based on these facts:

See attached affidavit

☐ Continued on the attached sheet.


Complainant's signature

Zachary F. Ferster, Special Agent, DEA

Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.


Judge's signature

Date: July 16, 2021City and state: Detroit, Michigan

Hon. Anthony P. Patti, United States Magistrate Judge

Printed name and title

Affidavit

I, Zachary Ferster, being duly sworn, depose and state the following:

I. Introduction

1. I am a Special Agent with the Drug Enforcement Administration (DEA), United States Department of Justice. As such, I am a “federal law enforcement officer” as defined in Federal Rule of Criminal Procedure 41(a)(2)(C).

2. I have been a DEA Special Agent since November 2020, and am currently assigned to the Detroit Division Office, Task Force Group 8 (TFG8). In August 2020, I started the 14-week Basic Agent Training Program for the DEA at Quantico, Virginia, which was completed in November 2020. During that time, I received training that addressed the methods by which drug traffickers possess and distribute controlled substances; the manner and means in which they conceal and launder the proceeds from the distribution of controlled substances; the manner and means in which they protect their proceeds and their controlled substances; and the manner and means by which drug traffickers attempt to avoid law enforcement detection of their activities. The controlled substances as to which this training applied included, but were not limited to, marijuana, cocaine, heroin, fentanyl and methamphetamine.

3. I am aware of the following information from several sources, including but not limited to, my own personal observations and participation in this

investigation, including the writing and my review and analysis of oral and written reports.

4. I make this affidavit from personal knowledge based on my participation in this investigation, including the writing and review of reports by myself and/or other law enforcement agents, communications with others who have personal knowledge of the events and circumstances describes herein, and information gained through my training and experience. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all the details or facts related to this investigation.

Background

5. I, along with other law enforcement personnel, have developed probable cause that on or around July 14, 2021, G-Oni JONES conspired to distribute and possess with intent to distribute controlled substances, including fentanyl and marijuana, in violation of Title 21, United States Code, Sections 841 (a)(1) and 846.

6. Members of DEA Detroit Task Force Group 8 (TFG8), with the assistance of the Federal Bureau of Investigations (FBI) have been investigating a large-scale money laundering organization (MLO), operating in the Detroit Metro Area and additional cities throughout the United States, and affiliated with a Mexico-based Drug Trafficking Organization (DTO). This investigation was initiated based on a

traffic stop resulting in the seizure of approximately seven kilograms of fentanyl, approximately 1.5 kilograms of methamphetamine and additional amounts of pills of heroin and fentanyl. Since the inception of this investigation, Investigators of the DEA Detroit TFG8 have seized approximately \$1.5 million United States Currency (U.S.C.), approximately 523 grams of methamphetamine, and approximately 1109.9 gross grams suspected fentanyl.

7. Agents of DEA Detroit Task Force Group 8 (TFG8) have observed members of a Chinese Money Laundering Organization (CMLO), which operates in cities across the United States. To date, many of the associates related to the CMLO organization have been identified and are being federally prosecuted. Through physical and electronic surveillance of bulk currency pick-ups as well as extensive telephone toll analysis, DEA Detroit TFG8 has identified several DTO's which are responsible for delivering proceeds in the form of bulk currency derived from the sale of illegal narcotics to the CMLO, to include Detroit target subject G-Oni JONES.

8. JONES has been identified as a leader within a Detroit-based DTO, with ties to Mexico. While JONES was initially identified as a money courier, the investigation has developed to show that he is also involved in the drug trafficking side of the DTO. Agents have observed JONES deliver bulk United States currency, believed to be narcotics proceeds, to members of a CMLO, as well as

observed JONES participate in narcotics transactions, all in the Eastern District of Michigan, specifically in Detroit, Michigan.

9. Investigators have observed JONES utilizing 2101 West Lafayette Boulevard, Apt. 309, Detroit, Michigan 48216 as a residence and as a potential stash location, to store narcotics and/or narcotic proceeds.

10. In approximately June 2021, a credible DEA Source of Information (SOI-1), who has provided information to Investigators over the past 18 months, leading to the seizures of approximately \$250,000 and large amounts of methamphetamine, told Investigators that JONES plans to be traveling to Ohio with the intention to transport narcotics in the near future. TFG8 acted on the information and in early July 2021, obtained a State of Michigan Search Warrant signed by the Honorable Judge Ryan Zemke, authorizing Ongoing Precision location of mobile device (GPS Location) on 313-221-4144, a cellular telephone number associated with JONES.

11. In the early morning of July 14, 2021, investigators monitoring the GPS location data associated with JONES' cellular telephone number, observed that the cellular phone was pinging off of towers in Illinois. Based on training and experience, investigators believe that JONES traveled in the early morning in an attempt to evade law enforcement. Knowing that Chicago, Illinois is a source city for heroin and fentanyl, TFG8 maintained electronic surveillance of the cellular phone while attempting to locate JONES in order to conduct physical and mobile

surveillance. During previous surveillance, TFG8 observed JONES driving a Dodge Magnum, bearing MI registration EDH 3162. A law enforcement database query of MI registration EDH 3162 revealed a 2005 Dodge Magnum, registered to G-Oni Lemar JONES at 2101 W Lafayette Boulevard, Apt. 309, Detroit, MI. Knowing that JONES had been previously identified in the Dodge Magnum, TFG8 attempted to locate the vehicle.

12. At approximately 9:25 a.m., on July 14, 2021 the Dodge Magnum was located traveling eastbound on I-80 in Ohio and physical surveillance was maintained on the vehicle. At approximately 9:32 a.m., around mile marker 36 on I-80 East, Ohio State Police conducted a traffic stop on the Dodge Magnum.

13. During the traffic stop, JONES was positively identified as the driver of the vehicle. The Ohio State Police deployed canine officer “Boy” around the vehicle.

“Boy” alerted for the presence of narcotic odor emitting from the vehicle.

Subsequent to the positive alert from “Boy,” the Ohio State Police conducted a search of the vehicle and found a concealed compartment in the trunk. Inside the concealed compartment investigators discovered approximately sixteen (16) kilograms of suspected fentanyl. The suspected fentanyl was seized by investigators, and JONES was arrested and detained.



Sixteen kilograms of suspected fentanyl seized

14. In the afternoon of July 14, 2021, TFG8 executed a Federal Search Warrant signed by United States Magistrate Judge Anthony P. Patti of the Eastern District of Michigan, on JONES's residence, 2101 West Lafayette Blvd Apt. 309, Detroit, MI. After executing the warrant, investigators searched the apartment for additional evidence against JONES. During the search investigators discovered nine, clear-sealed 1 lb. pound bags of suspected marijuana, which, based on my training and experience, is an amount consistent with distribution and not personal use. The marijuana was found in an 18-gallon, green container.



Marijuana seized from 2101 West Lafayette, Apt 309, Detroit, MI

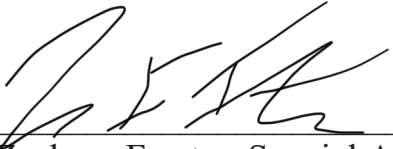
15. Investigators also found cash inside of a backpack near where the marijuana was located. It was in a bundle secured with rubber bands, which is consistent with how drug traffickers package drug proceeds. The cash was in varying denominations, also consistent with drug proceeds. The cash has not been counted officially; however, it appears to be several thousand dollars.

16. Inside JONES' Detroit residence, investigators also found several receipts for money orders in \$1,000 dollar amounts. Likewise, inside of JONES' vehicle, there was a receipt for a \$9,000.00 cash deposit to a local credit union dated March 15, 2021.

17. Investigators also seized additional evidence, including but not limited to multiple telephones and laptops. Through training and experience, investigators believe that those devices were used by JONES to further his drug trafficking organization.


Conclusion

18. Based on the facts established throughout this affidavit, probable cause exists to believe that G-Oni JONES did knowingly and intentionally conspire with others, both known and unknown, to possess with intent to distribute controlled substances, including fentanyl and marijuana, in violation of Title 21, United States Code, Sections 841 (a)(1) and 846.



Zachary Ferster, Special Agent
Drug Enforcement Administration

Sworn to before me and signed in my presence
and/or by reliable electronic means.



Honorable Anthony P. Patti
United States Magistrate Judge

Dated: July 16, 2021